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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

MAUREEN TOFFOLONI, as Administrarix and Personal Representative of the ESTATE OF NANCY E. BENOIT, Plaintiff, v. LFP PUBLISHING GROUP, LLC, d/b/a Hustler Magazine, MARK SAMANSKY, an Individual, and other distributors and sellers of, Hustler Magazine, as Defendants X, Y, and Z, Defendants.	)))))))))))))))))	CIVIL ACTION FILE NO. 1:08-CV-0421-TWT

JOINT MOTION FOR CONSENT PROTECTIVE ORDER

COME NOW Plaintiff Maureen Toffoloni and Defendant LFP Publishing Group, LLC (together the "Parties") and, pursuant to Fed. R. Civ. P. 26(c) hereby respectfully move the Court for entry of a Stipulated Protective Order Governing Confidential Information, which is attached hereto. In support of this request, the Parties show this Honorable Court the following:

1. The Parties seek to discover from each other, and potentially from third-parties, information they believe in good faith to be sensitive, confidential,

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proprietary, and/or trade secret information necessary and relevant to the adjudication of this matter.

2. The Parties have conferred and are in agreement that a protective order is necessary to govern the disclosure and use of such information, and agree as to the appropriate scope of such order.

3. The Parties further agree that good cause exists to protect from unnecessary disclosure the sensitive, confidential, proprietary and/or trade secret information requested by the Parties. The Parties thus jointly request that this Honorable Court enter the proposed protective order governing confidential information attached hereto at Tab A.

WHEREFORE, the Parties jointly and respectfully pray that this Court inquire into and sustain this Motion, and enter the proposed protective order governing confidential material which is attached hereto at Exhibit A.

Respectfully submitted this 21st day of December, 2009.

[Signatures on following page]

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CERTIFICATE OF SERVICE

This is to certify that I have this day filed the within and foregoing **JOINT CONSENT MOTION FOR ENTRY OF PROTECTIVE ORDER** via the CM/ECF system which will automatically send notification to Plaintiff's attorney of record, who is a participant in the CM/ECF system.

Respectfully submitted this 21st day of December 2009.

/s/ S. Derek Bauer
S. Derek Bauer

Attorney for Defendant
LFP PUBLISHING GROUP, LLC

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